Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	CC Docket No. 93-129
800 Data Base Access Tariffs and the	)	
800 Service Management System Tariff	)	

GTE'S REPLY

GTE Service Corporation, on behalf of
the GTE Telephone Operating
Companies and the GTE System
Telephone Companies

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May 5, 1994

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SUMMARY

GTE has provided extensive and detailed descriptions of its 800 data base service and the methodologies used to calculate per query charges. With the filing of its cost model documentation, GTE provided substantial additional data and information to support its 800 data base filings. In these submissions, GTE has demonstrated that its tariff is consistent with Commission policies regarding the provisioning and rating of 800 data base services.

GTE responds herein to the allegations by the filing commenters that GTE has failed to demonstrate the reasonableness of its rates. GTE shows in its Direct Case and this Reply that the exogenous costs included in the 800 data base costs are reasonable and fully in accordance with the Commission's directives, that the cost allocations and forecast assumptions are appropriate and that the other tariff terms and conditions for 800 query services are reasonable and justified.

GTE urges the Commission to conclude this investigation and to allow the 800 data base rates originally proposed by GTE to remain in effect without further adjustment.

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GTE Service Corporation, on behalf of the GTE Telephone Operating Companies ("GTOCs") and GTE System Telephone Companies ("GSTCs") (collectively referred to as "GTE"), hereby submit their Reply to comments submitted on GTE's Direct Case in the above-captioned tariff investigation.

I. INTRODUCTION

GTE filed tariff revisions on March 1, 1993 and March 5, 1993 proposing to establish rates, terms and conditions for 800 Data Base Query Services in accordance with Commission Orders.[1] On April 29, 1993, the Common Carrier Bureau suspended a portion of GTE's proposed rates for 800 data base service and allowed the 800 data base tariffs to go into effect subject to investigation.[2] On September 20, 1993, GTE submitted its Direct Case in the 800 data base

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[1] In the Matter of Provision of Access for 800 Service, Second Report and Order, 8 FCC Rcd 907 (1993) ("Rate Structure Order"); In the Matter of Provision of Access for 800 Service, Memorandum Opinion and Order, 8 FCC Rcd 1402 (1993), ("MO&O"); and In the Matter of Provision of Access for 800 Service, 8 FCC Rcd 1423 (1993)("February 10 Order").

[2] Bell Operating Companies' Tariff for the 800 Service Management System and 800 Data Base Access Tariffs, Order, 8 FCC Rcd 3242 ("Tariff Order").

tariff investigation pursuant to the Bureau's Designation Order.[3] GTE filed detailed documentation of the cost model used to develop 800 data base charges on March 15, 1994, in compliance with the requirements of the Designation Order. Since GTE's 800 data base cost model contains certain proprietary information, GTE filed a revised petition for waiver, in accordance with the Bureau's Order of January 31, 1994,[4] requesting permission to disclose its cost model information only to those parties signing a protective agreement. Therefore, GTE filed a Public Version of its cost model and provided a Confidential Version to the Bureau on March 15, 1994.

On April 15, 1994 and April 22, 1994, comments on GTE's Direct Case were filed by Ad Hoc Telecommunications User Committee ("Ad Hoc"), Compuserve, Inc., First Financial Management Corporation ("FFMC"), MCI Telecommunications Corporation ("MCI"), National Data Corporation ("NDC") and Sprint Communications Company L.P. ("Sprint"). MCI requested confidential treatment of comments filed separately in response to GTE's confidential version of its Direct Case. Since it is not necessary to refer to proprietary information to reply to MCI's confidential submission, GTE is responding to all of MCI comments in this Reply.

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[3] Order Designating Issues for Investigation, CC Docket 93-129, 8 FCC Rcd 5132 (1993.)("Designation Order")

[4] In the Matter of Provision of Access for 800 Service, D.A. 94-99 (released January 31, 1994).

Comments submitted in this investigation contain allegations that LECs have failed to demonstrate the reasonableness of exogenous costs, to explain cost allocations and forecast assumptions and to justify their tariff terms and conditions for 800 query services.

GTE has provided extensive and detailed descriptions of the manner in which it has isolated costs directly attributable to the implementation of 800 data base service and the methodologies used to calculate per query charges. With the filing of its cost model documentation, GTE has provided a substantial amount of data and information to support its 800 data base filings. Further, GTE has demonstrated that its tariff is consistent with Commission policies regarding the provisioning and rating of 800 data base services. GTE urges the Commission to conclude this investigation and to allow the 800 data base rates originally proposed by GTE to remain in effect without adjustment.

II. EXOGENOUS COSTS REFLECTED IN GTE'S 800 DATA BASE RATES HAVE BEEN INCURRED SPECIFICALLY TO IMPLEMENT 800 DATA BASE SERVICES

Parties filing comments on the 800 data base direct cases generally claim that LECs have not justified exogenous cost treatment for various network components and have not demonstrated that these costs will be used exclusively for implementing 800 data base services. The filing commenters imply that most 800 data base related costs should be classified as general network upgrades, which fall outside the Commission's definition of exogenous.

In the Rate Structure Order, the Commission anticipated costs associated with Service Control Points ("SCPs"), Service Management System ("SMS") and links between SCPs and the SMS would be accorded exogenous treatment and could be reflected in adjustments to the LECs' switched access PCIs. The Commission also recognized that other expenses associated with 800 data base services could be classified as exogenous, if the LEC could demonstrate that the costs were incurred specifically for implementing basic 800 services.

GTE's original tariff filing and subsequent submissions identified all exogenous costs required to implement the 800 data base query service in GTE serving areas. The list included costs for SCPs, the SMS, links between the SCPs and the SMS, and tandem and end-office SSP ("Service Signaling Point") Right to Use ("RTUs") fees that have been incurred exclusively for the purpose of 800 data base query service. GTE replies below specifically to comments regarding GTE's 800 data base exogenous costs, by cost category:

A. SSP Costs

MCI (at 11) and NDC (at 9) assert that all 800 data base related SSP software should be classified as a general network upgrade and excluded from the definition of exogenous. MCI (at 10-12) suggests that SSP software functionality deployed by GTE will be used for multiple services other than the routing of 800 queries, although MCI fails to cite any specific alternative use. AdHoc (at 7,8) contends that all costs for SSPs and tandems are presumptively

core SS7 costs and are not eligible for exogenous treatment in connection with 800 data base.

GTE companies have deployed 800-specific software packages at their end offices and access tandems so that 800 queries could be launched from the sites where carriers connect to GTE's network. This software was not installed to accelerate the development of the network, nor is it a component of generic network software upgrades. In general, SSP is the software component in a digital switching system that (1) formulates a standardized message from on-board data coupled with customer provided data (dialed digits), (2) sends the message to a predestined database (typically located on a SCP), (3) receives the reply in response to the query and (4) passes the returned data to the requesting underlying application. GTE has incurred approximately $18 million in SSP software right-to-use fees in order to perform these functions in connection with the deployment of 800 data base.

SSP 800 data base software was installed by GTE only to meet the requirement to query the national 800 number data base for purposes of routing originating 800 calls. In contrast, GTE implements regular upgrades to existing switch software to improve network efficiencies and to enhance GTE's ability to provide a broader range of services to its customer. Costs of these generic upgrades are generally "assumed" under price caps (e.g., not classified as exogenous costs for purposes of adjusting the price cap index); however, their

deployment results in enhancing overall productivity and efficiency, a primary incentive under price cap regulation.

Claims that SSP software may be used for other services are simply speculations on the part of many commenting on Direct Cases. For example, although MCI (at 12) claims that GTE's end office RTUs "may be useful for other services," MCI does not identify exactly what specific services SSP 800 data base software can support other than 800 data base query functions. GTE is not aware of any alternative use for this software nor are there any plans by software vendors to extend or modify its features to support other services or network functions.

GTE properly categorized as exogenous SSP RTU fees since these costs are not generic core SS7 costs and therefore are not reflected in the composition of existing price cap index values. Absent the regulatory mandate to implement 800 data base query services, GTE would not have incurred any expense related to 800 SSP software deployment. Therefore these expenses are correctly considered an unavoidable cost. Since the use of this software is integral to the implementation of the 800 data base query function, and is used for this function alone, it is a reasonable and valid component of 800 database exogenous costs.

B. SCP and Link Costs

MCI (at 19) challenges the direct assignment of SCP costs to 800 data base, questioning if SCPs will continue to be used exclusively for 800 data base.

AdHoc (at 8) and NDC (at 11) claim that assignments to 800 data base of SCP link costs where such facilities are used for other services, such as LIDB, are inappropriate under the Rate Structure Order. FFMC (at 5) and Compuserve (at 6) contend that portions of STP and link costs are not attributable solely to 800 data base and that costs that support existing or planned services other than 800 data base should be denied exogenous treatment.

The Rate Structure Order specifically identified SCP costs as legitimate exogenous costs attributable to 800 data base services. GTE's SCPs located in Illinois and Indiana support both 800 and Line Information Data Base ("LIDB") services. GTE's SCPs in California support only 800 services. The only SCP cost directly assigned to 800 data base are those associated with billing memory and disk drives for SMS, since these expenses were incurred solely to provide 800 data base query access. GTE further assigned a portion of these costs to its intraLATA 800 service offering.[5] GTE also categorized 100% of the SCP to SMS link costs as exogenous, as permitted in the Rate Structure Order. Links connecting other nodes in the network (i.e., STP to SCP links) which are used in the processing of 800 data base queries were not defined to be exogenous and were excluded from the development of the basic query charge.[6]

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[5] MCI (at 16) incorrectly charges that GTE has not assigned any costs to the interexchange basket. GTE's cost study data filed on March 15, 1994 clearly shows allocations of costs to GTE's Business Line 800 Service, an intraLATA service filed in both state and interstate intraLATA tariffs (GTOC Tariff FCC No. 2).

[6] GTE did not include any costs associated with STPs in the derivation of the per query exogenous cost.

Other applicable SCP costs were allocated among various services on a relative use basis. For SCP capitalized hardware and SCP Common Expensed Software/RTU Fees, 61.05% of total cost was allocated to 800 data base with the remainder allocated to LIDB and intraLATA 800.

NDC (at 11,12) asserts that LEC allocations fail to account for differing costs of handling 800 queries as compared to other services, and that LECs have inappropriately allocated costs on an undifferentiated query count basis. GTE converted all forecasted service units into Message Signaling Units ("MSUs")[7] for purposes of developing allocation factors. These factors were developed by dividing 800 data base MSUs by total SCP MSUs. Different types of service transactions require different numbers (and octet composition) of MSUs. Therefore, the conversion of all SS7-related service queries into a common unit of measure results in cost allocations that properly reflect that service's relative use of network facilities.

GTE submits that it is reasonable to allocate facility costs and expenses among rates for all services that use such facilities so that each customer contributes, in a non-discriminatory manner, to the recovery of those costs. Since relative SCP costs were reflected in the development of GTE's LIDB rates, it is reasonable to assign a relative portion of these costs to 800 data base to insure cross-subsidization of service costs does not occur. Allocation of costs on

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[7] MSUs are a generic unit of processing in the SS7 protocol.

a relative use basis is the most logical method to reflect such costs in individual service rate elements.

MCI (at 28,29), AdHoc (at 11) and NDC (at 14) argue that the Commission should require all LECs to use Part 36 allocators rather than demand or direct assignment. The Commission allowed exogenous cost treatment of a narrowly defined set of costs for a specific network function, 800 data base query. While Part 36 may be useful in constructing service category revenue requirements under rate of return regulation, it provides no methodology to isolate and jurisdictionalize 800 data base specific costs. Only the use of a relative use allocator results in the identification of unique interstate 800 data base service exogenous costs.

GTE calculated exogenous costs for 800 data base services on a total query basis since the cost of a query itself does not vary by jurisdiction. The per query exogenous cost was reflected in the PCI adjustment by multiplying the per query cost by interstate demand and using the resulting value as the exogenous cost change variable ("Z") in the PCI formula. The use of a Part 36 allocator, such as dial equipment minutes, to adjust GTE's exogenous cost per query value would result in a mismatch of allocated costs and revenues since these allocators would not reflect actual 800 query usage over the SS7 network.

In the required data submission accompanying the Direct Case, GTE reported relative interstate and intrastate 800 data base usage factors and applied these factors equally to both cost and demand estimates. This

calculation results in the same per query exogenous cost reported in GTE's original filing. (See GTE Direct Case, Attachment 1.)

C. SMS Costs

MCI (at 38, 39) makes the broad allegation that the LECs have failed to demonstrate the validity of SMS costs claimed as exogenous. As reported in GTE's Direct Case, GTE's annual cost for SMS/800 expenses is approximately $1.3 million. This cost amount was based on a pro forma estimate reflecting GTE network requirements provided to GTE by Bellcore. The SMS contract with Bellcore provides for GTE's access to SMS, downloading of data from the SMS to GTE's SCP, updates of the SCP for routing purposes, and dial up capabilities for the validation of records. GTE makes monthly payments to Bellcore, including any applicable sales and use taxes upon receipt of bills rendered by Bellcore. GTE is dependant on Bellcore to provide these estimates and reasonably included these costs in its exogenous cost amount. Any adjustment of GTE's per query rate to remove a portion of these costs, as MCI suggests, would preclude GTE from recovering legitimate data base access costs for which it has little or no control.

Sprint argues that GTE categorizes SMS costs that are related to GTE's role as a RESPORG as exogenous. None of the reported SMS costs are related to GTE RESPORG activities. At the time the original 800 cost study was developed, GTE had no intention of acting as a RESPORG and included no costs related to RESPORG services. If GTE decides to provide RESPORG

services in the future, RESPORG costs would be separately recovered from RESPORG customers.

MCI (at 35,36) also claims that GTE has included specifically defined "administrative cost increases" and proposes to recover for billing system upgrades. Contrary to MCI's contention, billing cost upgrades were not included in the exogenous cost calculation. GTE spent $550,000 for the deployment of disk drives and memory to be able to bill from the Bellcore SMS format. The annual cost of $79,000, identified in Appendix 1 of MCI's comments, represents an average or typical annual exogenous investment amount. The one-time-only cost for the drives and memory ($550,000) was multiplied by a 72% basic to total 800 query ratio and then divided by a five-year economic service life. The resulting value was included in the exogenous cost per query amount. No billing system upgrades were included in GTE's 800 data base cost study.

D. Overhead Expense

MCI (at 32, fn 83) claims that the cost support provided by GTE was insufficient to determine if overhead expenses were included in exogenous costs. GTE's cost study filed on March 15, 1994, which was provided to MCI, was very detailed, showing the development of all allocation factors and a step-by-step illustration of the development of the exogenous cost per query. GTE's study clearly shows no overhead loadings applied to investments in order to calculate exogenous costs for the basic query charge.

III. GTE'S FORECAST OF 800 DATA BASE QUERIES REFLECTS RECENT 800 SERVICE GROWTH AND ACCURATELY PORTRAYS EXPECTED 800 QUERY GROWTH

In order to determine the exogenous cost per query, GTE divided the total exogenous cost amount by a forecast of 800 data base queries. GTE relied on historical 800 call attempts as the basis for its demand forecast. GTE constructed a five-year forecast for the overall quantity of basic and vertical service queries based on these historical 800 call growth rates.

A. Forecasting Assumptions

MCI (at 42,43) claims that overall, LECs used widely disparate and conflicting demand assumptions and have not demonstrated the reasonableness of their 800 data base query forecasts. MCI (at 44) and Sprint (at 13, 14) challenge GTE's assumptions that 800 data base implementation will not result in any additional 800 demand stimulation. FFMC (at 8) and Compuserve (at 10) question the accuracy of the assumptions used to develop per query demand derived from minute of use data.

While the commenters imply that some national demand should have been used by all carriers, it was reasonable for each LEC to forecast demand based upon its own historical experience. GTE developed a five-year 800 data base forecast based on the number of 800 call attempts screened at its 800 call handling offices in 1991. GTE then analyzed historical 800 call growth patterns

which revealed an average 10% annual growth rate for 800 call volumes for the total GTE system. Individual study areas achieved higher or lower growth rates than the system average. GTE used this historical growth rate as the basis for determining forecasted queries for a five-year period. The relative number of basic versus vertical service queries for each forecast period was based on the historical number of basic and vertical service query records downloaded from the SMS database and on the quantity and types of customers to whom GTE expects to route 800 calls. This forecast was derived from GTE forecast information and industry data from Bellcore. The exact GTE 800 data base architecture was designed to meet this demand.

GTE expects 800 data base query demand to maintain the same historical growth rate over the next several years for the GTE system. Number portability and 800 feature routing are new service benefits of 800 data base offerings that directly benefit the 800 number subscriber. While these features may enourage 800 subscribers to switch carriers, GTE does not believe that these new features will directly stimulate additional end user dialed 800 calls. The 800 services market has been extremely competitive with respect to price, even prior to the introduction of 800 number portability. GTE expects subscriber prices charged by the interexchange carriers to decline only minimally as a result of competitive positioning among the carriers and does not expect that such price reductions will stimulate an appreciable level of demand over and above historical 800 industry trends. Therefore, the assumptions used to forecast

demand were totally reasonable when used to develop the 800 data base query rates.

IV. THE COMMISSION SHOULD ALLOW LECS TO IMPLEMENT RESTRUCTURES AND EXOGENOUS COSTS ADJUSTMENTS BASED ON METHOD 3

Both AT&T (AT 6) and MCI (AT 41) support Method 3, outlined in the Designation Order, as the most desirable method to adjust PCI values to reflect additional exogenous costs while implementing a rate restructure. This is essentially the method GTE employed, with one exception. The new basic 800 service rate was set to recover not only the full exogenous cost amount, but also a just and reasonable portion of overhead costs. Overhead costs should be excluded from the calculation of the exogenous costs for determination of the PCI adjustment but allowed in the determination of the actual 800 data base rate.

The Commission should allow LECs to use Method 3, but should not mandate any specific approach for future price cap filings. The filing of 800 data base rates in compliance with the Rate Structure Order was indeed unique in that it required the establishment of restructured rates (basic query charge), exogenous cost changes, and the filing of rates under the new services rules (vertical service charges). However, there are no assurances that any method established for 800 data base services would easily extend to other future

service filings. Since its inception, the Commission's price cap plan has been revised by adding additional service sub-categories, pricing constraints and complex index calculation rules. GTE believes that rather than adding more layers of price cap guidelines, LECs should be allowed to propose methodologies that fit the unique characteristics of their restructure/exogenous cost filings. The Commission should then judge, on an individual filing basis, whether the proposed price cap index adjustments are reasonable.

V. GTE'S TARIFF TERMS AND CONDITIONS REFLECT THE MANNER IN WHICH 800 DATA BASE SERVICES ARE PROVIDED AND COMPLY WITH THE COMMISSION'S ORDERS

MCI (at 56) and Sprint (at 2) argue that the Commission should require LECs to offer Area of Service (AOS) routing as a basic service down to the LATA, state NPA and NPA-NXX levels. GTE currently provides AOS routing as proposed by MCI and Sprint as part of its basic query service. However, GTE is willing to modify its tariff to specify the level of routing, if necessary.

Both MCI (at 60) and Sprint (at 4) repeat their arguments that LECs should assess the query charge only on delivered calls. These suggestions run counter to the Commission's general cost causation principles. LECs incur costs associated with 800 query functions made on behalf of IXCs irrespective of whether the underlying 800 call is actually delivered to the IXC location. GTE's method of charging for 800 data base queries insures that the cost causer --the

IXC requesting 800 call routing– pays charges that reasonably recover the underlying service costs. Further, since this issue was raised in petitions for reconsideration of the Commission's Rate Structure Order, it should not be considered in this tariff investigation.

MCI (at 60) requests that the Commission require GTE to tariff a RESPORG tariff. In the February 10 Order, the Commission addressed the issue of RESPORG services. The Commission found that any qualified entity could act as a RESPORG.[8] While confirming the LECs eligibility to act as a RESPORG, the Commission never required tariffing of RESPORG services. In the same Order, the Commission found that access to the Service Management System ("SMS") had to be tariffed. While SMS was found to be a common carrier service, no similar determination was made for the RESPORG functions.

RESPORG functions are administrative in nature and would not be considered a Title II common carrier service under the NARUC standard.[9] In order to find that Title II applies, there must be a finding that the RESPORG service is an interstate or foreign communication service under Section 3(a) of the Communications Act and that it is provided as a common carier service. RESPORG services do not come within these criteria. First, communications service under Section 3(a) includes transmission of signals as well as services

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[8] 8 FCC Rcd 1428.

[9] National Association of Regulatory Utility Commissioners v. FCC, 525 F.2d 630 (D.C. Cir. 1976), cert. den., 425 U.S. 999 (1976).

incidential to such transmission. RESPORG services are neither transmission nor incidential to the tranmission of signals. It is purely an administrative function of ordering 800 services for a customer. Second, since any entity may act on a competitive basis as a RESPORG and no entity is legally compelled to act as a RESPORG, it does not come within the definition of a common carrier service. Thus, GTE believes that RESPORG services may be provided by contract and do not have to be tariffed.[10]

MCI (at 57) contends that GTE effectively bundles all of its vertical feature offerings with basic features. As clearly shown in its cost study and original submission, GTE calculated premium (vertical) features rates separately from the basic query element and tariffed two distinct rate elements for basic and vertical queries. GTE has not bundled charges for basic and vertical service features in its 800 data base tariff.

VI. THE CONFIDENTIAL VERSION OF MCI'S COMMENTS CONTAIN ERRONEOUS AND UNSUPPORTED ASSUMPTIONS AND PROVIDE NO BASIS FOR ANY ADJUSTMENT TO GTE'S RATES

Although MCI requested confidential treatment of its separately filed comments in response to GTE's confidential version of its Direct, it is not necessary to refer to proprietary information to reply to MCI's confidential submission separately. Thus, GTE will address all MCI comments in this Reply.

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[10] To the extent a LEC wants to include terms and conditions relative to its RESPORG activities in a tariff, it should be allowed to do so.

MCI claims that the computation of return on GTE plant investment for the premium query was overstated because investment was valued at the beginning of the year, rather than at investment less half the annual depreciation. GTE did not calculate return based on a mid-year conventional approach. However, backing one-half of the straight-line depreciation out of the net book for calculation of return and taxes, as MCI suggests, only lowers the total calculated cost by 0.75%, not enough to warrant a price change

MCI requests that "administrative expenses" be disallowed in total and calculates a disallowance, using GTE's cost model data filed on March 15, 1994.[11] MCI references arguments in its comments (at 36) which claim that billing system upgrades should not be allowed. As stated infra, GTE included $550,000 in disk and memory cost to be able to process billing from the SMS system. This is a one-time cost that is exogenous to the provision of 800 data base using the industry-determined SMS system. It is not an "administrative" billing cost, as claimed by MCI. The cost study shows that GTE clearly did not include administrative expenses or overheads in the exogenous cost calculation.

GTE followed the Commission's directives to file the basic 800 data base query as a restructured service and the vertical services 800 data base query as a new service under the Commission's price cap rules. Restructured services do not require the filing of a cost study, whereas new services require the filing of cost and demand data to support the proposed rate. A fully allocated cost study

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[11] MCI provides no explanation of how it arrived at the "disallowance" estimate.

(including administrative loadings) was filed by GTE in support of its vertical service charge and is appropriate and consistent under the price cap cost study guidelines for new services.

MCI's claims that GTE's administrative costs are overstated are based on a false premises. For example, MCI claims that maintenance and administration factors were misapplied, citing that these factors were computed from historical costs as a percentage of average net investment. MCI apparently has misinterpreted GTE's cost study. Line 19 of Worksheet 9, labeled "Net Book", is not investment net depreciation expense, but is that portion of total cost allocated to vertical 800 data base service. In actuality, GTE used factors that were computed from historical costs as a percentage of gross investment. The application of these factors to the total 800 data base amount on Line 19 is appropriate.

Based upon its calculations, MCI claims that GTE's costs should be decreased by $.0008. Since this adjustment is based upon incorrect or inconsistent assumptions and misinterpreted data, it should not be relied upon by the Commission.

VII. CONCLUSION

GTE has demonstrated the reasonableness of its 800 data base tariff and charges in its original tariff submission, its replies to petitions opposing the tariff, its Direct Case, information requests submitted to the Commission, cost model documentation filed on March 15, 1994 and this Reply. GTE has shown that its 800 data base charges accurately reflect the costs incurred by GTE to implement 800 number query functions as mandated by the Commission. The Commission should allow GTE's 800 data base tariffs to remain effective as originally filed.

Respectfully submitted,

GTE Service Corporation, on behalf of
the GTE Telephone Operating
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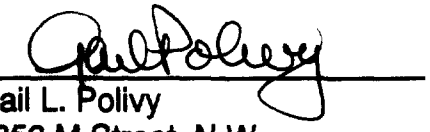
Telephone Companies

By 

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May 5, 1994

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Certificate of Service

I, Ann D. Berkowitz, hereby certify that copies of the foregoing "GTE's Reply Comments" have been mailed by first class United States mail, postage prepaid, on the 5th day of May, 1994 to all parties of record.

Ann D. Berkowitz